



COMES NOW PLAINTIFF WALTER L. WAGNER and respectfully moves this Court for preliminary injunctive relief in accordance with the *First Amended Complaint for Damages and Injunctive Relief* filed herein on October 4, 2011 and served on defendant WBGI on October 18, 2011 by Kelly Tmakiung, certified civil process server.

Plaintiff respectfully moves for injunctive relief specifically enjoining defendant WBGI from placing on its website any materials that are defamatory towards plaintiff, and mandating that they remove from their website existing defamatory materials, including but not limited to a copy of an "Indictment" naming plaintiff Walter L. Wagner that was dismissed in its entirety more than one year ago, a copy of a "Judgment" obtained in Hilo, Hawaii that was obtained by active fraud on the part of WBGI and which is currently pending review in the Hawaii courts based upon that fraud, a copy of a "Judgment" obtained in Reno, Nevada that was also obtained by the active fraud of defendant WBGI, and all related legal pleadings, transcripts, or other materials pertaining to those "indictments" and "judgments".

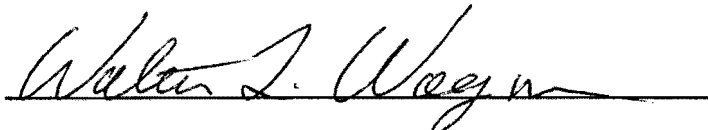
Plaintiff further respectfully moves this Court for an order mandating the placement of a "Corrective" on the WBGI website in the shareholder section, wherein those false and defamatory materials have been lodged, stating that plaintiff Walter L. Wagner was erroneously indicted based upon false

statements and that no criminal charges are pending and that WBGI is unaware of any criminal activity of plaintiff Walter L. Wagner, with the exact wording to be submitted at the conclusion of the hearing of this motion.

Plaintiff further respectfully moves this court for an order mandating that defendants make no further communications to the WBGI shareholders or others in which they either impugn the character of plaintiff, or otherwise imply that plaintiff engaged in theft, embezzlement or unlawful diversion of either Visitor Center account funds or other WBGI funds, and that any communications to WBGI shareholders or others with respect to plaintiff Walter L. Wagner be first submitted to this Court for approval.

This motion is based upon the amended complaint and this notice, upon the accompanying affidavits in support, upon the accompanying points and authorities in support, upon all other pleadings filed herein, and upon such other and further evidence and testimony as may be presented at the hearing of this motion.

DATED: November 9, 2011

A handwritten signature in cursive script, reading "Walter L. Wagner", is written over a horizontal line.

Walter L. Wagner